

## **Executive Summary:**

Lucas-Milhaupt Inc. has participated in the Wisconsin Green Tier program since September 2007. Lucas-Milhaupt manufactures brazing and soldering filler metals in the form of bulk, strip and wire, preformed strip and wire, pastes, powders, fluxes and other metal products for a wide range of industries including automotive, electronics, heating and air conditioning, aerospace and others. Lucas-Milhaupt, Inc. was founded in 1942 and employs approximately 190 people.

In 2017 Lucas-Milhaupt enjoyed continued growth due to expanded market share and economic upturn in manufacturing. Our continuous improvement projects ensure that we minimize our environmental impact and conserve natural and man-made resources through growth of the business.

## **Environmental Policy Statement:**

***Lucas-Milhaupt is committed to complying with all applicable environmental laws and regulations and to preserving the environment of the community in which we work and live by minimizing environmental risks associated with its operations. We are committed to continuous improvement of our Environmental Management System and performance including resource conservation and pollution prevention.***

## **Environmental Management System:**

Lucas-Milhaupt has had a formal Environmental Management System since 2003. Lucas Milhaupt Milwaukee is registered to ISO 14001. An annual surveillance audit performed by BSI in April 2017, No major non-conformances were reported. There were three minor non-conformance noted, which have action plans associated with these findings.

Minor non-conformances:

### **Finding # 1 –**

#### **Describe the non-conformance needing corrective action:**

Weekly hazardous waste inspection records (QF-82) missing for week of 2/20/17 and satellite area (QF-106) for weeks of 1/10/17 and 1/17/17.

Justification - This is justified as a minor because all other weeks for year to date were complete and 2016 records were also reviewed. Only 1 label issue was identified in 2016 and corrected.

#### **INVESTIGATION: Describe why the process/element was not being followed (ROOT CAUSE).**

During the BSI surveillance, it was noted several weeks were missed in the 2016/2017 weekly hazardous waste inspection. This was due to lack to an oversight for the week of Christmas shut down and 1 week Steve was on vacation.

#### **CORRECTIVE ACTION TAKEN:**

Train additional employees in weekly hazardous waste inspection
Create sheet to audit multiple hazardous waste areas in same area (formulated)

**Finding # 2 –**

**Describe the non-conformance needing corrective action:**

Not all environmental records are on QF 77 Records Master List. SDS records, permits, and environmental reports are not on the records master list.

Justification - This is justified as a minor because records are maintained, and some are shown on the Legal and Other Requirements matrix, but not all environmental records and retention are defined.

**INVESTIGATION:** Describe why the process/element was not being followed (ROOT CAUSE).

The record retention procedures references QF-77 Records master list as the location for record retention. This applies only to QF forms in the QMS/EMS form. The items listed were not on this list due to not having a QF form #.

**CORRECTIVE ACTION TAKEN:**

Change to Record retention policy to reflect EMS record retention location in compliance calendar. (QF-205)
ALL EMS related items will have their required record retention outlined in the compliance calendar (QF-205)

**Finding # 3**

**Describe the non-conformance needing corrective action:**

Federal Regulations, Wisconsin Green Tier requirements and local city Ordinances are not included on QF-121 Legal and Other Requirements matrix.

Justification - This is justified as a minor because the requirements are being met, but the regulations are not noted on the list, only the state regulations are listed.

**INVESTIGATION:** Describe why the process/element was not being followed (ROOT CAUSE).

It was noted during the BSI audit that several Legal and Other requirements were missing from QF-121. Notably legal requirements for Federal, WDNR Green tier and local City of Cudahy Ordinances. When reviewing the QF-121 Matrix, only state regulations were listed.

The organization did not take these legal and other requirements into account when creating the QF-121 matrix. Lucas Milhaupt will review all required Legal and other requirements and have a 3<sup>rd</sup> party (Sigma Environmental) verify these requirements

**CORRECTIVE ACTION TAKEN:**


Review all Federal, State and Local regulations – enter these on the QF-121 form
Review all other requirements ( REACH, ROHS, Customer) and enter on QF-121 form
Have 3 <sup>rd</sup> party review the QF-121 matrix to ensure all requirements have been captures

**2016 Objectives & Targets Updates:**


# TARGETS AND OBJECTIVES

**Lucas Milhaupt 2016 Aspect & Impact Projects** Last Updated: December 2015

Terminated due  
to customer  
issues




**METHYL ETHYL KETONE**  
Reduce/Eliminate MEK in Coating  
**Objective:** By replacing MEK with DMC we are eliminating approximately 1,970 lbs. of VOC's from our facility each year. Current MEK usage represents roughly 3% of the total VOC's emitted by this facility each year.  
**Target:** Eliminate the use of MEK at LMM




**WASTEWATER TREATMENT SYSTEM II (totes Analysis)**  
Eliminate the need to treat all waste as Hazardous Waste  
**Objective:** By improving containing and analyzing each tote LMM eliminates all contaminants that were being evaporated into the air and the majority of the totes test out as nonhazardous thus saving treatment cost. It also allows LMM to remain in compliance with a SQG.  
**Target:** Reduce, by 15%, the annual number of totes that need to be classified as hazardous. 2016 will be the first year of data collection.

complete

complete



**AIR CONTAMINATION**  
Reduce/Eliminate Flux Dust in HVAC Operation  
**Objective:** By improving this flux formula the air quality at the LMM facility will improve, there will be a reduction in contaminants, the need to shut down for cleaning operations will be reduced, the need to replace filters on a weekly basis will be reduced, and the amount of flux that is used in the operation will be reduced - less waste.  
**Target:** To have a filter replacement program that allows one filter replacement every two weeks, currently 2 filter replacements per week.



**BUILDING HEAT**  
Improve Efficiency of heating/cooling the LMM facility  
**Objective:** As units are replaced the replacements will save energy, provide a better work environment and operate more efficiently.  
**Target:** A minimum 25% reduction on kilowatt hours based on a comparison of January 2016 - January 2017 WE Energy Invoices.

complete

**2017 Targets and Objectives:**

2017 Target and Objectives Verification			
Objective Title/Brief Description	Reduce hazardous waste generation	Proposed Savings Measure	Verified Savings
Objective Category	Environmental		
Target Description	100 % reduction in Isopar G haz waste reduction	2,193 lbs of hazardous waste	1st shipment on 3/22/17 - Envirosafe - 3 drums @ 440 lbs per drum = elimination YTD of 1320 lb of hazardous waste
Objective Title/Brief Description	wastewater reduction	Proposed Savings Measure	Verified Savings
Objective Category	Environmental		
Target Description	10 % reduction in treatment cost or disposal	106,000 gallons in 2016 - savings of 10,060 gallons or \$\$\$	
Objective Title/Brief Description	Flux sludge reduction/ disposal \$	Proposed Savings Measure	Verified Savings
Objective Category	Environmental		
Target Description	15% reduction in flux sludge or disposal costs	145 lbs (1465 lbs in 2016)	